



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

October 17, 1994

Mr. Fred Evans
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Draft Final Workplan Site 9 Neptune Drive Disposal Site
NAS Brunswick
September 1994

Dear Fred:

The United States Environmental Protection Agency (EPA) has reviewed the above referenced document. The EPA's comments are found in Attachment I of this letter. Should you have any questions regarding the EPA's comments, please feel free to call me at (617) 223-5521.

Sincerely,

Robert Lim, Remedial Project Manager
Federal Facilities Superfund Section

Attachments

cc. Steve Mierzykowski/USFWS
Nancy Beardsley/MEDEP
Jim Caruthers/NASB
Elizabeth Walter/ABB-ES (including guidance documents)
Susan Weddle/BACSE
Carolyn LePage/Gerber, Inc.
Sam Butcher/Harpswell Community Rep.
Rene Bernier/Topsham Community Rep.



ATTACHMENT I

The following are the EPA's comments pertaining to the document entitled **Draft Final Workplan Site 9 Neptune Drive Disposal Site** dated September 1994.

General Comments

1. The final workplan should identify the laboratory that will be conducting the laboratory analysis.
2. As presented in the workplan for the West Runway Area, this workplan should provide summary tables showing the laboratory analytical program. A copy of the summary table from the West Runway Area workplan is attached (see attachment II).

Specific Comments

3. Page 2-4, ¶ 2: For organic sample collection, isopropyl alcohol should also be used prior to the last deionized water rinse.
4. Page 3-18, ¶ 3: a) Regarding soil sampling from the backhoe bucket, the EPA suggests that the soil samples be collected from the center of the backhoe bucket to avoid contact with the bucket.

b) Please specify the selection procedure for determining the "one soil sample per test pit and one soil sample from the soil boring" which will be sent for off-site laboratory analysis.
5. Page 3-19, ¶ 2: If a bailer will be used for groundwater sampling, text should identify material of support lines. In addition, support lines must not be constructed of any material that could cause contamination.
6. Page 3-20, ¶ 2: As well as in the summary table, please specify or reference in text the groundwater level measurement procedure.
7. Page 4-9, 2nd Bullet: The workplan specifies that vinyl chloride will be analyzed using a low level selective-ion-monitoring (SIM) method, however the EPA recommends the use of EPA Region 1 Special Analytical Services Method 524.2 and revisions for low concentration organics (see attachment III).
8. Page 4-10, ¶ 1: For your information and possible use, the EPA is providing the Navy and ABB-ES, Inc. with a copy of **Region I Tiered Organic and Inorganic Data Validation Guidelines**. This tiered approach has been recently developed by the region.

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TABLE 3-1
LABORATORY ANALYTICAL PROGRAM

WEST RUNWAY STUDY AREA
SITE INSPECTION WORK PLAN
NAS BRUNSWICK

MEDIA	PARAMETER	METHOD	REFERENCE	CONTAINER REQUIREMENTS	PRESERVATION REQUIREMENTS	HOLDING TIME ⁽¹⁾ LIMIT
	TAL Elements	AAS/PES/CVAA	3/90 SOW, revised ILM 02.1 (9/91)	1-liter Plastic	4°C, HNO ₃ pH < 2	6 months (30 days for mercury)
	Temperature (field)	Thermometric	USEPA Method 170.1	N/A	N/A	N/A
	pH (field)	Potentiometric	USEPA Method 150.1	N/A	N/A	N/A
	Specific Conductivity (field)	Electronometric	USEPA Method 120.1	N/A	N/A	N/A
	Hardness	Colorimetric	USEPA Method 130.1	1-liter Glass	4°C, HNO ₃ pH < 2	6 months
	Turbidity (field)	Nephelometric	USEPA Method 180.1	N/A	N/A	N/A

Notes:

- GC/MS ■ Gas Chromatography/Mass Spectrometry
- SOW ■ USEPA Contract Laboratory Program, Statement of Work
- GC/ECD ■ Gas Chromatography/Electron Capture Detection
- AAS ■ Atomic Absorption Spectroscopy
- PES ■ Plasma Emission Spectroscopy
- TCL ■ Target Compound List
- TAL ■ Target Analyte List
- VOC ■ Volatile Organic Compound
- SVOC ■ Semivolatile Organic Compound
- PCB ■ Polychlorinated Biphenyl
- * ■ 6/91 Statement of Work, "Superfund Analytical Methods for Low-Concentration Water for Organics Analysis"; USEPA Contract Laboratory Program; USEPA, 1991.
- (1) ■ Holding times from date of receipt by the Laboratory (NEESA 20.2-047B, 1988)
- TCLP ■ Toxicity Characteristic Leachate Procedure
- CVAA ■ Cold Vapor Atomic Absorption

**TABLE 3-2
SUMMARY OF PROPOSED LABORATORY ANALYTICAL PROGRAM**

**WEST RUNWAY STUDY AREA
SITE INSPECTION WORK PLAN
NAS BRUNSWICK**

WEST RUNWAY STUDY AREA	LABORATORY ANALYTICAL PROCEDURES									
	SOIL/SEDIMENT SAMPLES					SEEP/SURFACE WATER SAMPLES				
	TCL VOCs	TCL SVOCs	TCL PEST./ PCBs	TAL INORGANICS	TCLP	TCL VOCs	TCL SVOCs	TCL PEST./ PCBs	TAL INORGANICS	HARDNESS
Subtotal	23	23	23	23	12	7	7	7	7	2
Field Duplicates	3	3	3	3	2	1	1	1	1	1
Sampler Blanks	3	3	3	3	N/A	1	1	1	1	1
Trip Blanks*	8	0	0	0	N/A	3	0	0	0	0
Source Water Blanks	3	3	3	3	N/A	1	1	1	1	1
MS/MSD Samples	2/2	2/2	2/2	2/2	2	2	2	2	2	2
Total	36	36	36	36	16	13	12	12	12	8

Notes:

- VOC = Volatile Organic Compounds
- TCL = USEPA Target Compound List
- TAL = USEPA Target Analyte List
- SVOCs = Semivolatile Organic Compounds
- Pest = Pesticides
- PCBs = Polychlorinated biphenyls
- TCLP = Toxicity Characteristic Leachate Procedure
- MS/MSD = Matrix spike/matrix spike duplicate
- N/A = Not applicable
- * = Assumes up to three samples will be collected each day and sent off site in one cooler to the laboratory for analysis.